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Via Electronic Mail

August 15, 2016

Mr. Tim Maley Remedial Project Manager U.S. EPA Region V Superfund Division (SR-6J) 77 W. Jackson Blvd. Chicago, IL 60604-3590

Reference:

Gary Development Landfill Superfund Site, Gary, Indiana

Administrative Settlement Agreement and Order on Consent for the

Remedial Investigation/Feasibility Study,

CERCLA Docket No. V-W-14-C-004

July 2016 Monthly Progress Report #027

Dear Mr. Maley:

In fulfillment of the requirements of Section IX, Paragraph 32, of the Administrative Settlement Agreement and Order on Consent for the Remedial Investigation/Feasibility Study, CERCLA Docket No. V-W-14-C-004, the Respondents are submitting the July 2016 monthly progress report.

Should you have any questions or comments, please contact Mr. Mike Samples, or me, at (865) 691-5052.

Sincerely,

de maximis, inc.

Bennie L. Underwood Project Coordinator

BLU/MHS/ Enclosure

CC:

(via e-mail)

Leslie Blake, EPA Nick Cooper, IDEM Jeff Cahn, Esq., EPA

David Rieser, Esq., K&L Gates Mike Samples, *de maximis* Mark Raybuck, Parsons GDL Technical Committee



MONTHLY PROGRESS REPORT - #027

PROJECT NAME:

Gary Development Landfill Superfund Site

PERIOD COVERED:

July 2016

A. <u>ACTIONS TAKEN TOWARD COMPLIANCE WITH THE SETTLEMENT</u> AGREEMENT

- Perimeter groundwater investigation activities (direct push/hollow stem auger drilling and groundwater sampling) in accordance with Section 3.5.5.2 of the RI/FS Work Plan continued during the reporting period (see Changes in RI/FS Work Plans or Activities).
- In a letter dated July 6, 2016, the United States Environmental Protection Agency (EPA) provided the Gary Development Landfill Site Group (Respondents) with approval of the recommendations proposed in a June 24, 2016 letter, entitled, "Landfill Gas Screening". Consistent with this approval, soil vapor points AS02 and AS05 were installed on July 18, 2016.
- In a letter dated July 6, 2016, the Respondents received notification that Mr. Tim Maley would be EPA's interim Remedial Project Manager (RPM), replacing Mrs. Leslie Blake. On July 7, 2016, representatives on behalf of EPA, the Indiana Department of Environmental Protection (IDEM), and the Respondents participated in a conference call to discuss the RPM transition and RI field progress.
- On July 13, 2016, representatives on behalf of EPA, IDEM and the Respondents
 participated in a call to discuss the perimeter groundwater investigation activities.
 During this call it was agreed that the Respondents contractor would continue to
 monitor and document vegetation regrowth at the Site, which is limiting
 stormwater run-off, and would not need to install silt fencing nor attempt to collect
 a sample per the Erosion Control Measures Memorandum, dated May 25, 2016.
- On two occasions following rain events (July 6 and 28, 2016), the Site was inspected for potential stormwater runoff, and no evidence of runoff was found.
- In response to email correspondence from IDEM dated July 13, 2016, the Respondents provided IDEM with a July 15, 2016 request for disbursement of funds from the Gary Development Company Landfill Fund Trust.



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- In email correspondence dated, July 15, 2016, EPA was provided with a copy of the confirmation notice associated with the July 14, 2016 wired full payment towards EPA's future response cost invoice.
- During the period of July 11 through 15, 2016, geotechnical samples were collected in accordance with section 3.5.5.1 (Existing Landfill Cover Evaluation) of the RI/FS Work Plan.
- During the reporting period the Respondents provided the Canadian National Railroad (CN) with requested documentation necessary for gaining access to CN's right-of-way for the purpose of completing two perimeter groundwater investigation locations (see conditions of EPA's June 15, 2016 letter regarding field modifications).
- On July 29, 2016, soil was imported and an approximately 24" cap placed on top
 of the area of smoldering waste. Since the soil placement, no signs of smoke or
 smoldering have been observed.

B. SAMPLING AND TESTING ACTIONS AND RESULTS

- Under a cover letter dated July 5, 2016, the Respondents provided EPA with laboratory analytical results associated with a May 26, 2016 surface depression water sample.
- During the reporting period, groundwater sampling continued at several of the Geoprobe (direct push) temporary well locations. Once all of the temporary groundwater wells have been sampled, analyzed and reviewed by the Respondents, the results will be transmitted to EPA along with proposed locations for permanent groundwater monitoring wells.

C/D. WORK PLANNED FOR NEXT TWO MONTHS AND SCHEDULE OF SIGNIFICANT ACTIVITIES / DELIVERABLES

- Complete remaining perimeter groundwater investigation locations in accordance with Section 3.5.5.2 of the RI/FS work plan.
- Complete sampling of groundwater from the temporary wells pursuant to Section 3.5.4 of the RI/FS Work Plan.



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- On August 2, 2016, participate in a Site visit with EPA's interim RPM.
- Install six (6) interior landfill investigation borings pursuant to Section 3.5.5.3 of the RI/FS Work Plan, and convert three of these borings to monitoring wells.
- Review groundwater data and select locations for required groundwater monitoring wells. Discuss proposed locations with EPA and following approval, initiate monitoring well construction.
- Perform evaluations of remaining site building and other building debris.
- Implement gas vent and air sampling pursuant to Section 3.5.5.4 of the RI/FS work plan (two soil vapor probes and six existing gas vents).
- Pursuant to Section 3.5.2.2 of the RI/FS work plan, perform sediment sampling in the southern wetlands.
- Continue discussions with the Canadian National Railroad regarding access.
- The first quarterly groundwater sampling event is scheduled to occur in mid-September 2016. Monthly water levels will also be initiated in mid-September.

E. CHANGES IN RI/FS WORK PLANS OR ACTIVITIES

- To address issues associated with refusal, and with concurrence from EPA and IDEM, the drilling method for the temporary wells was modified from Geoprobe to hollow-stem auger to complete the remaining boring locations.
- During a July 18, 2016 telephone conversation between representatives for EPA
 and the Respondents, and as documented in an email dated July 18, 2016, it
 was agreed that potable water would be incorporated into the drilling process to
 address health and safety concerns related to gas issues. Also, EPA agreed that
 soil may be brought on-Site to address the smoldering waste area which resulted
 from a brush fire initiated by off-Site railroad maintenance activities.



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F. ENCOUNTERED / ANTICIPATED DELAYS

• Direct push (Geoprobe) activities have required more time than expected due to encountering impenetrable debris at several locations. The drilling subcontractor has changed to hollow-stem auger method in order to complete work at the remaining five (5) locations. Additionally, potable water was incorporated into the drilling process to address health and safety concerns related to landfill gas issues. However, assuming a progress rate of at least one boring or well per day, the Respondents do not expect this to substantially impact the overall project schedule.

G. COMMUNITY RELATIONS ACTIVITIES

None.